

1 ROB BONTA  
Attorney General of California  
2 ANYA M. BINSACCA  
EDWARD KIM  
3 Supervising Deputy Attorneys General  
CHRISTINA SEIN GOOT, State Bar No. 229094  
4 KRISTIN A. LISKI, State Bar No. 315994  
Deputy Attorneys General  
5 455 Golden Gate Avenue, Suite 11000  
San Francisco, CA 94102-7004  
6 Telephone: (415) 510-3916  
Fax: (415) 703-5480  
7 E-mail: Kristin.Liska@doj.ca.gov  
Attorneys for Defendants

8  
9 IN THE UNITED STATES DISTRICT COURT  
10 FOR THE EASTERN DISTRICT OF CALIFORNIA  
11 SACRAMENTO DIVISION

12  
13 **LETRINH HOANG, D.O., PHYSICIANS**  
14 **FOR INFORMED CONSENT, a not-for**  
15 **profit organization, and CHILDREN'S**  
16 **HEALTH DEFENSE, CALIFORNIA**  
17 **CHAPTER, a California Nonprofit**  
18 **Corporation,**

19 Plaintiffs,

20 v.

21 **ROB BONTA, in his official capacity as**  
22 **Attorney General of California, and ERIKA**  
23 **CALDERON, in her official capacity as**  
24 **Executive Officer of the Osteopathic**  
25 **Medical Board of California ("OMBC"),**

26 Defendants.

Case No. 2:22-cv-02147-WBS-AC

27 **STIPULATION TO SET BRIEFING**  
28 **SCHEDULE AND EXTEND TIME TO**  
**ANSWER**

Dept: 5  
Judge: The Honorable William B. Shubb  
Trial Date: Not scheduled  
Action Filed: 12/01/2022

**STIPULATION**

Plaintiffs and Defendants, by and through their representative counsel, hereby stipulate as follows:

WHEREAS,

1. Plaintiffs filed this action on December 1, 2022;
2. Plaintiffs filed a motion for a preliminary injunction on December 6, 2022;
3. Plaintiffs' motion for a preliminary injunction was originally scheduled for hearing on January 17, 2023;
4. On December 8, 2022, this matter was related to *Hoag v. Newsom*, No. 22-cv-1980 and reassigned to District Judge William B. Schubb;
5. On December 9, 2022, the hearing on plaintiffs' motion for a preliminary injunction was rescheduled for January 23, 2023 without changing the deadlines for briefing;
6. Defendants' opposition to plaintiff's motion to a preliminary injunction is currently due December 21, 2022;
7. Defendants' response to the complaint is currently due December 28, 2022;
8. The parties agree that good cause is established for the extension of time for defendants to respond to the complaint because the parties' and Court's efforts are best focused on the preliminary injunction. The extension is the parties' first request and will not affect any of the other dates set in this case. In addition, since the Court has moved the hearing date further out, the parties agree that additional time to brief the opposition and reply regarding the preliminary injunction will help ensure more fulsome consideration of the issues.

This stipulated extension does not constitute a waiver of any claim, right, or defense.

THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and among the undersigned counsel, that

1. Defendants' responses to the complaint will be due 30 days after the Court issues its ruling on the pending motion for a preliminary injunction [ECF No. 4];
2. Defendants' opposition to the motion for a preliminary injunction shall be due December 27, 2022;

3. Any reply brief supporting the motion shall be due January 9, 2023.

A proposed order is attached to this stipulation.

Dated: December 20, 2022

Respectfully submitted,

ROB BONTA  
Attorney General of California  
ANYA M. BINSACCA  
EDWARD KIM  
Supervising Deputy Attorneys General  
CHRISTINA SEIN GOOT  
Deputy Attorney General

/s/ Kristin Liska

KRISTIN A. LISKA  
Deputy Attorney General  
*Attorneys for Defendants*

Dated: December 20, 2022

Respectfully submitted,

/s/ Richard Jaffe

RICHARD JAFFE

ROBERT F. KENNEDY JR.  
MARY HOLLAND  
Children's Health Defense  
*Attorneys for Plaintiffs*

**CERTIFICATE OF SERVICE**

Case Name: ***Letrinh Hoang, D.O., Physicians for Informed Consent, et al. v. Rob Bonta, et al.***

Case No. **2:22-cv-02147-WBS-AC**

I hereby certify that on December 20, 2022, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

**1. STIPULATION TO SET BRIEFING SCHEDULE AND EXTEND TIME TO ANSWER**

**2. [PROPOSED] ORDER**

I certify that **all** participants in the case are registered CM/ECF users and that service will be electronically accomplished by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct.

Executed on December 20, 2022, at San Francisco, California.

\_\_\_\_\_  
Vanessa Jordan  
Declarant

\_\_\_\_\_  
*Vanessa Jordan*  
Signature